

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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IN RE PHILIPS RECALLED CPAP,  
BI-LEVEL PAP, AND MECHANICAL  
VENTILATOR PRODUCTS LITIGATION

This document relates to: All Personal Injury  
Cases

Master Docket: 2:21-MC-1230

MDL No. 3014

Judge Joy Flowers Conti

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**JOINT MOTION TO ENTER PRELIMINARY ORDER #31**

Defendants Philips RS North America LLC, Koninklijke Philips N.V., Philips North America LLC, Philips Holding USA, Inc., and Philips RS North America Holding Corporation (the “Philips Defendants”), along with Plaintiffs’ Co-Lead Counsel, jointly request entry of the attached proposed Order setting forth procedures for the Philips Defendants’ filing of a Master Third-Party Complaint against SoClean, Inc. and DW Management Services, LLC.

Dated: March 15, 2024

Respectfully Submitted,

/s/ Sandra Duggan

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 15, 2024, the foregoing document was electronically filed with the Clerk of the Court and served upon counsel of record through the Court's ECF filing system.

/s/ William B. Monahan  
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